

ROC920030304US1
10/675,266

8

REMARKS

Claims 1, 6, 11, and 16 are amended. Claims 2-3, 12, 13, and 17 were previously canceled without prejudice or disclaimer. No new matter is added by these amendments. By amending and canceling the claims, applicants are not conceding that the claims are unpatentable under 35 U.S.C. 103, as the present claim amendments are only for the purpose of facilitating expeditious prosecution. Applicant respectfully reserves the right to pursue these and other claims in one or more continuations and/or divisional applications. Claims 1, 4-11, 14-16, and 18-20 are pending. Applicant respectfully requests reconsideration and allowance of all claims in view of the amendments above and the remarks that follow.

Rejections under 35 U.S.C. 103

Claims 1, 4-11, 14-16, and 18-19 are rejected under 35 U.S.C. 103(a) as unpatentable over Barnes (US 6,993,533) in view of the Open Directory Project. Claim 9 is rejected under 35 U.S.C. 103(a) as unpatentable over Barnes in view of the Open Directory Project and Tabb (US 5,603,025). Claim 20 is rejected under 35 U.S.C. 103(a) as unpatentable over Barnes, the Open Directory Project, and Pearson ("Default Value").

Applicant respectfully traverses these grounds for rejection because all of the elements of the claims are not taught or suggested by the references, as further argued below.

Claim 1 recites: "creating a model norm based on a data dictionary, wherein a format of the data dictionary is standardized by an agreement among the plurality of information suppliers," which is not taught or suggested by the references because modifying the Open Directory Project to require a data dictionary standardized by an agreement among information suppliers would destroy the purpose of the Open Directory Project. The purpose of the Open Directory Project is to "build the largest human-edited directory of the Web," which would be destroyed if all of the web sites categorized by the

ROC920030304US1
10/675,266

9

Open Directory Project, including such disparate sites as "video games" and "biology" were required to agree to a standard data dictionary. Thus, the Open Directory Project teaches away from "creating a model norm based on a data dictionary, wherein a format of the data dictionary is standardized by an agreement among the plurality of information suppliers," and such teaching away is compelling evidence of non-obviousness.

Claim 1 further recites: "ordering the plurality of records in the report based on a sort rule in the model norm," which is not taught by the references alone or in any combination. The Office Action relied on Figure 5 of Barnes for "ordering the plurality of records in the report based on a sort rule in the model norm." Applicant respectfully disagrees for the reasons argued below.

Barnes, Figure 5, illustrates a name 510, a title 512, a subtitle 514, a header logo 516, a footer 520, a template 522, a select statement 522, an employee ID 554, a first name 556, a last name 558, a sum statement 560, an mb_chart 562, an mb_drilldown 564, a from statement 566, employees 568, orders 570, order_details 572, a where statement 574, an employee id 576, an AND statement with an order id 578, and a group by statement 580, none of which teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1.

The Barnes name 510 merely identifies "the name of the report," as recited at column 12, lines 32-33 and does not teach or suggest a sort order. The Barnes title 512 and subtitle 514 are merely the text: "MoreBetter Traders" and "Employee Listing," which can be seen in Figure 5 and in Figure 7 as the title and subtitle, which does not teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1. The Barnes header logo 516 is illustrated in Figure 5 as a file name in the "gif" format. The gif format encodes files that contain images, which does not teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1. The footer 520 is illustrated in Figure 5 as "page {P} of {N} on {D} and {T}," which presumably causes the current page number, the total number of pages, the date, and the time, to be printed near the bottom of

ROC920030304US1
10/675,266

10

each page of the report, which does not teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1. The Barnes template 522, as described at Barnes column 12, lines 36-38 identifies "a report template (such as a bar chart, pie chart, cross table chart, or some combination of charts), which does not teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1. The Barnes select statement 522 is an SQL statement that specifies records to be retrieved and does not teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1. The Barnes employee ID 554, the first name 556, and the last name 558 specify "fields in the employee table" (Barnes at column 12, lines 51-53), which does not teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1.

The Barnes sum statement 560, as recited in Barnes at column 12, lines 56-65, recites that "another column, labeled 'Total Sales,' be included in the result set. The values in the "Total Sales" column are to contain the summation of all the products of the "Quantity" and "UnitPrice" fields of the "Order.sub.--Details" tables (see line 572), where the following two conditions are met: the "OrderID" of the "Order.sub.--Details" table matches the "OrderID" of the "Orders" table (lines 570, 578); and the "EmployeeID" of the "Employees" table matches the "EmployeeID" of the "Orders" table (line 576)," which does not teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1.

The Barnes statements 562 and 564, as recited in Barnes at column 13, lines 2-13: "instruct the DBMS to include two additional columns, containing strings of characters, to the result set. These strings of characters constitute "metadata," that is, definitional data used to describe the context, quality, and relational characteristics of the non-metadata data of the result set. In accordance with the present invention, it is by constructing a DQL query to create metadata that the DQL programmer defines linking relationships between the report to be generated by the parameters of FIG. 5, and other drill-down reports (whose parameters are specified elsewhere, for example, as shown in

ROC920030304US1
10/675,266

11

FIG. 8),” which does not teach or suggest “ordering the plurality of records in the report based on a sort rule in the model norm,” as recited in claim 1.

The Barnes group by statement 580 specifies the columns that are not part of the sum aggregate function, which does not teach or suggest “ordering the plurality of records in the report based on a sort rule in the model norm,” as recited in claim 1.

Thus, Figure 5 of Barnes does not teach or suggest: “ordering the plurality of records in the report based on a sort rule in the model norm,” as recited in claim 1 because Barnes does not provide any ordering of records.

The default value of Pearson does not make up for the Barnes deficiencies that are previously argued above. The Tabb highlight that indicates additional information is available does not make up for the Barnes deficiencies that were previously argued above. The Open Directory Project web directory also does not make up for the Barnes deficiencies that were previously argued above.

Claims 6, 11, and 16 recite similar elements as previously argued above for claim 1 and are patentable over the references for similar reasons as those argued above. Claims 4, 5, 7-10, 13-15, and 18-20 are dependent on claims 1, 6, 11, and 16, and are patentable over the references for the reasons argued above.

ROC920030304US1
10/675,266

12

Conclusion

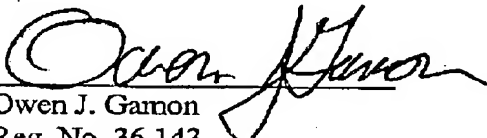
Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is requested. The Examiner is invited to telephone Applicant's attorney (651-645-7135) to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 09-0465.

Respectfully submitted,

Kenneth J. Burger, et al.

By their Representative,


Owen J. Gamon
Reg. No. 36,143
(651) 645-7135

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IBM Corporation
Intellectual Property Law
Dept. 917, Bldg. 006-1
3605 Highway 52 North
Rochester, MN 55901

CERTIFICATE UNDER 37 CFR 1.8: I hereby certify that this correspondence is being transmitted via facsimile to the Commissioner for Patents 571-273-8300, on June 20, 2007.

Owen J. Gamon
Name


Signature